

UNITED STATES DISTRICT COURT
DISTRICT OF NEW MEXICO

§
IN THE MATTER OF JOLEEN K. § Case No. 1:22-mc-00030-KG
YOUNGERS
§
§

STIPULATION OF DISMISSAL

Pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii), Petitioner Joleen K. Youngers, in her capacity as the Personal Representative of the Wrongful Death Estate of Kesley Vial, and Respondents U.S. Immigration and Customs Enforcement, Department of Homeland Security, CoreCivic, Inc., and Torrance County, by and through their attorneys of record, hereby stipulate to the dismissal of the above-styled action without prejudice.

Date: October 3, 2024

Respectfully submitted,

ACLU OF NEW MEXICO

/s/ Rebecca Sheff

Rebecca Sheff

Maria Martinez Sanchez

P.O. Box 566

Albuquerque, NM 87103

T: 505-266-5915 ext. 1007

rsheff@aclu-nm.org

msanchez@aclu-nm.org

BENOIT LEGAL, PLLC

/s/ Christopher Benoit

Christopher Benoit

311 Montana Ave., Ste. B

El Paso, TX 79902

T: (915) -532-5544

chris@coylefirm.com

Counsel for Petitioner

and

/s/ Manuel Lucero (with permission by email
10/1/2024)

Manuel Lucero
Assistant United States Attorney
P.O. Box 607
201 3rd St. NW Suite 900
Albuquerque, NM 87103
(505) 224-1467
Manny.lucero@usdoj.gov

*Counsel for Respondents U.S. Immigration
and Customs Enforcement and Department
of Homeland Security*

/s/ Jacob Lee (with permission by email
10/1/2024)

Daniel P. Struck, AZ Bar No. 012377
Jacob B. Lee, NM Bar No. 15461
Jamie D. Guzman AZ Bar No. 022095
STRUCK LOVE BOJANOWSKI &
ACEDO, PLC
3100 West Ray Road Suite 300
Chandler, AZ 85226
480-420-1600
DStruck@strucklove.com
JLee@strucklove.com
JGuzman@strucklove.com

Deborah D. Wells
Debra J. Moulton
KENNEDY, MOULTON & WELLS PC
2201 San Pedro NE
Building 3, Suite 200
Albuquerque, NM 87110
505-884-7887
ddwells@kmwpc.com
dmoulton@kmwpc.com

*Counsel for Respondents CoreCivic, Inc.
and Torrance County*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing was served upon all counsel of record via the CM/ECF system this 3rd day of October, 2024.

/s/ Rebecca Sheff
Rebecca Sheff